

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES
Plaintiff

v.

YORK COUNTY POLICE
DEPARTMENT, JAMES H. MORRAN,
RICHARD PEDDICKARD, RAYMOND E. CRAIL,
GENE POLLAK, DET. KREISLER, CO. BAYLARKE,
Randy Shipes, BRIAN WESPAORSLAND,
and DIRECTIVE GLOWCIENSKI,
Defendants

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)

RECEIVED

OCT 28 2003

OFFICE OF ATTORNEY GENERAL
LITIGATION SECTION

~~DEFENDANT'S ANSWER AND OBJECTION~~

In accordance with Federal Rules Of Civil Procedure, Rule 33, plaintiff requests that Defendant, York County Police Dept., ET AL, answer the following interrogatories separately and fully in writing under oath, and that the answers be signed by the person making them and be served on plaintiffs within 45 days of service hereof.

In responding to these interrogatories, furnish all information which is available to you, including information in the possession of your attorneys or investigators for your attorneys, and merely information known of your own personal knowledge.

If you can't answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information, or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes throughout this proceeding.

1. what is your full name and address?

this proceeding.



2. On January 10, 2001, were you employed by the Pennsylvania State Attorney General Office?

3. On January 10, 2001, were you on duty as a Police officer/Agent, at the Mail Box Etc., 2536 Eastern Blvd., York Pennsylvania, located at the Kingston Square Center?

4. If yes, what was your reasons or purpose of being at that location; what is the full names, capacity and last known business and residence address of the individual who was your immediate superior?

(a) Where your superior present on January 10, 2001, at the Mail Box Etc., Kingston Square Center?

(b) If yes, what was their purpose for being at that location?

(c) At what time of the day did you go on duty?

(d) At what time of the day did you go off duty?

5. Did you have any encounter, or contact with Plaintiff's, Tyrone P. James, on January 10, 2001?

6. If yes, state specifically and in detail, as accurately as you can remember, the exact sequence of events that occurred subsequent to your initial encounter, or contact with the Plaintiff, on that date.

7. Did you at any time on January 10, 2001, or on any other date, trample upon, ran over, use a vehicle in the arrest, arrest, handcuffed, beat, strike, kick, spray with MACE, or with any other chemical, used a vehicle to struck Plaintiff, denied Plaintiff access to counsel, or otherwise abuse Plaintiff?

8. If yes, were any other person involved?

9. Was any written report made of the details of the conduct in interrogatories number- ??

10. If yes, state:

(a) The name, badge or identification number, and present address of the persons who prepared each such report;

(b) The name, or identification number, and present address of the person

or persons for whom each such report was prepared;

- (c) The date, time and place where each such report was prepared;
- (d) The name, badge, or identification number, and present address of the present custodian of each such report.
11. If the answer to question 9 is yes, was each such report written, or reduced to writing?
12. If yes, attach a copy of each such written report to your answer to these interrogatories.
13. State the names and address, or otherwise identify and locate any person, or persons, who, to your knowledge, or to the knowledge of your Agents and Attorneys, purport to have knowledge of facts relevant to the conduct described in these interrogatories.
14. Do you, your Attorneys, or any person employed by you, or your Attorneys, have possession, or known of the existence of any books, records, reports made in the ordinary course of business, other printed, or documentary material, or photographs, drawings, or documents, or other tangible objects that are relevant to the conduct described in these interrogatories?
15. If yes, state the names and descriptions of each such item; the names and addresses of each person who made, prepared, or took each such item; the names and addresses of the custodian of each such items; the date, time and place where each items were made, prepared, or taken; the method by and purpose for which each such items were made, prepared, or taken;
- (a) The manner in which each such items were is relevant to the conduct described in these interrogatories.
16. If the answer to question 14, is yes, do you have knowledge of any item mentioned there being altered in any manner, lost or destroyed?

Date : October 24, 2003.

By, _____
Tyrone James
(Signatures)

Tyrone P. James
EX 9451
P.O. Box A
Bellafonte, PA 16323-0000